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June 8, 2023

VIA E-FILING

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

RE: LTL Management, LLC re Chapter 11  
Case No. 23-12825 (MBK)

Dear Chief Judge Kaplan:

My office represents Defendants, Estate of Sherri Gendelman and Estate of Melissa Fleming regarding Motion to Dismiss filed with the Court on May 5, 2023 and "incorporated with the with all arguments contained in the Motion of the Official Committee of Talc Claims to Dismiss the Second Bankruptcy Petition of LTL Management, LLC". A hearing is scheduled on June 27, 2023 at 10:00 a.m. in connection with the two separate Motions to Dismiss. I am writing to request the Court consider my clients' Motions on the papers only with no oral argument.

Thank you for your consideration in this matter.

Respectfully submitted,

  
\_\_\_\_\_  
Geoffrey B. Gompers

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

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***PROPOSED ATTORNEYS FOR DEBTOR***

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

In re:

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Adv. No. 23-01092 (MBK)

**Hearing Date and Time:**  
June 27, 2023 at 10:00 a.m.

**DEBTOR'S OMNIBUS OBJECTION TO MOTIONS TO DISMISS**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

LTL Management LLC (the “Debtor”), the debtor in the above-captioned chapter 11 case (the “Chapter 11 Case”) and plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), objects to the motions to dismiss filed by the Estate of Melissa Fleming [Adv. Dkt. 117] and Robert Gendelman as Executor of the Estate of Sherri Gendelman [Adv. Dkt. 118] (together, the “Motions to Dismiss”).

Although the Motions to Dismiss were filed in the Adversary Proceeding, both motions adopt the arguments asserted in the motion to dismiss the Chapter 11 Case [Dkt. 286] filed by the Official Committee of Talc Claimants. See Adv. Dkt. 117-2 (“incorporate all arguments contained in the Motion of the Official Committee of Talc Claims to Dismiss the Second Bankruptcy Petition of LTL Management, LLC thereon through the same were set forth herein at length”); Adv. Dkt. 118-2 (same). Indeed, in the proposed orders submitted with the Motions to Dismiss, the movants request that the Court order that “Case No. 23.12825 (MBK) [i.e., the Chapter 11 Case, not this Adversary Proceeding] is **DISMISSED**.” See Adv. Dkts. 117-1, 118-1 (emphasis in original).

The Debtor believes the Motions to Dismiss were incorrectly filed in the Adversary Proceeding, and the Debtor opposes the relief requested in the Motions to Dismiss for all of the reasons set forth in the *Debtor’s Omnibus Objection to Motions to Dismiss Chapter 11 Case* [Dkt. 614], filed contemporaneously herewith in the Chapter 11 Case. The Motions to Dismiss should be denied.

Dated: May 26, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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